

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION**

**MISSOURI PRIMATE FOUNDATION,  
et al.,**

**Plaintiffs and  
Counterclaim Defendants,**

**v.**

**PEOPLE FOR THE ETHICAL  
TREATMENT OF ANIMALS, INC., et al.,**

**Defendants and  
Counterclaim Plaintiffs.**

**Case No. 4:16-cv-02163**

**[PROPOSED] ORDER**

Before the Court is the Motion for an Order Compelling Discovery Against Counterclaim Defendant Connie Braun Casey (“Casey”) brought by Counterclaim Plaintiffs, People for the Ethical Treatment of Animals, Inc. and Angela Scott a/k/a Angela G. Cagnasso (together, “Plaintiffs”) pursuant to Rule 37 of the Federal Rules of Civil Procedure. Good cause appearing, **IT IS HEREBY ORDERED** that Plaintiffs’ motion is **GRANTED** as follows.

**IT IS ORDERED** that Casey shall conduct a thorough, good faith search of all documents in her possession, custody or control, and produce all documents responsive to Plaintiffs’ Document Requests Nos. 1, 7, 15, 22, 27, within seven business days of the date of the Order.

**IT IS FURTHER ORDERED** that if Casey previously had responsive documents in her possession, custody or control, but those documents were destroyed, Casey shall identify the contents of each destroyed document and state when the document was destroyed.

**IT IS FURTHER ORDERED** that if Casey does not have any written Programs of Veterinary Care and/or Environment Enhancement Plan(s) signed by an attending veterinarian, that she confirm such, within seven business days of the date of the Order.

**IT IS FURTHER ORDERED** that, pursuant to Fed. R. Civ. P. 26(a)(1)(A)(iii)), Casey shall provide both a computation of claimed damages of which she is presently aware, and supporting documents, showing how damages were calculated within seven business days of the date of the Order.

**IT IS FURTHER ORDERED** that Casey shall pay Plaintiffs' costs and attorneys' fees relating to the motion to compel, and that Plaintiffs have 14 days from the date of the order granting this motion for sanctions to file an affidavit detailing these attorneys' fees and costs.

Date: \_\_\_\_\_

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CATHERINE D. PERRY  
UNITED STATES DISTRICT JUDGE